

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CIRBA INC. (d/b/a DENSIFY)  
and CIRBA IP, INC.,

*Plaintiffs and Counter-  
Defendants,*

v.

VMWARE, INC.,

*Defendant and Counter-  
Plaintiff.*

C.A. No. 19-742-LPS

(CONSOLIDATED)

**VMWARE, INC.'S MOTION TO COMPEL**

Pursuant to the Court's Stipulation and Order Relating to Procedures for Resolving Discovery Disputes Before Special Master (D.I. 1028), VMware, Inc. moves the Court for an Order compelling Cirba Inc. (d/b/a Densify) and Cirba IP, Inc. (collectively, "Cirba") to: (1) produce documents and information regarding its litigation financing in response to VMware's Request for Production No. 199 and Interrogatory No. 33; and (2) supplement Cirba's May 11, 2021 Initial Infringement Contentions to provide fair notice of its infringement theories. A proposed order is attached to VMware's letter brief.

The grounds for this motion are set forth in VMware's letter brief in support of its motion to compel and the letter's exhibits, which were submitted to the Special Master contemporaneously herewith. Pursuant to D. Del. LR 7.1.1., undersigned counsel certifies that a reasonable effort was made to reach agreement with Cirba regarding the matters set forth in this motion, including oral communication involving Delaware counsel for all parties, but no agreement was reached.

Dated: August 19, 2021

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**CERTIFICATE OF SERVICE**

I, Anne Shea Gaza, hereby certify that on August 19, 2021, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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I further certify that on August 19, 2021, I caused the foregoing document to be served via electronic mail upon the above-listed counsel and on the following:

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